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*Representing the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRIAN PATRICK SOLOMON,

Defendant.

Case No.: 24-cr-00224-JAD-NJK

**Protective Order**

The United States respectfully requests that the Court issue an Order protecting from disclosure to the defendant, Brian Patrick Solomon, the public, or any third party not directly related to this case, any and all unredacted discovery (the “Protected Material”) in this case.

On October 1, 2024, a Federal Grand Jury returned an Indictment charging Solomon with one count of Interstate Communications with Threat to Injure, in violation of 18 U.S.C. § 875(c), and one count of Cyberstalking, in violation of 18 U.S.C. § 2661A(2)(B).<sup>1</sup> The arraignment and plea hearing is currently set for October 8, 2024. On October 3, 2024, the

<sup>1</sup> ECF # 11

1 parties met and conferred via email to discuss a potential stipulation for a protective order, but  
2 were unable to come to an agreement.

3 In order to prevent dissemination of the Protected Material, the government requests to  
4 restrict access to the Protected Material in this case to the following individuals: attorneys for  
5 all parties and any personnel that the attorneys for all parties consider necessary to assist in  
6 performing the attorneys' duties in the prosecution or defense of this case, including  
7 investigators, paralegals, experts, support staff, interpreters, and any other individuals  
8 specifically authorized by the Court (collectively, the "Covered Individuals").

9 The government requests that the defendant, Brian Patrick Solomon, not obtain a copy  
10 of the Protected Material. The defendant may, however, review the Protected Material in the  
11 presence of his attorney.

12 Without leave of Court, the government requests the Covered Individuals not:

- 13 a. make copies for, or allow copies of any kind to be made by any other person  
14 of the Protected Material in this case or permit dissemination of the Protected  
15 Material, to include leaving a copy of the Protected Material with the  
16 defendant unattended;
- 17 b. allow any other person to watch, listen, or otherwise review the Protected  
18 Material;
- 19 c. use the Protected Material for any other purpose other than preparing to  
20 defend against or prosecute the charges in the indictment or any superseding  
21 indictment arising out of this case; or
- 22 d. attach the Protected Material to any of the pleadings, briefs, or other court  
23 filings except to the extent those pleadings, briefs, or filings are filed under  
24 seal.

1 Nothing in this motion is intended to restrict the parties' use or introduction of the  
2 Protected Material as evidence at trial or support in motion practice. If the defendant proceeds  
3 to trial or any evidentiary hearing, the government will confer with defense counsel to  
4 determine whether the terms of the requested order should be revisited.

5 The government requests that the parties inform any person to whom disclosure may be  
6 made pursuant to this order of the existence and terms of this Court's order.

7  
8 DATED October 8, 2024

9 Respectfully submitted,

10 JASON FRIERSON  
11 United States Attorney

12 /s/ Courtney Strange  
13 COURTNEY STRANGE  
14 Assistant United States Attorney

15 **IT IS SO ORDERED:**

16 October 10, 2024

17 \_\_\_\_\_  
18 Date

19   
20 \_\_\_\_\_  
21 NANCY J. KOPPE  
22 UNITED STATES MAGISTRATE JUDGE  
23  
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